

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BRUCE WILSON AND EMINENT
ENERGY PROMOTIONS,

PLAINTIFFS

v.

BARBARA BARRA, PAUL O'DONNELL
AND LEE HECHT HARRISON,

DEFENDANTS

C.A. # 05 - 30067 - MAP

MOTION OF THE PLAINTIFFS TO DISMISS, PURSUANT TO FED. R. CIV. P. 56[C]
THE MOTION OF THE DEFENDANTS TO DISMISS PLAINTIFFS' COMPLAINT
PURSUANT TO FED. R. CIV. P. 12[B][6]

*PLAINTIFFS MOVE PURSUANT TO FED. R. CIV. P. 56[C] FOR DISMISSAL OF
DEFENDANTS' MOTION BECAUSE THERE EXISTS A GENUINE ISSUE AS TO A
MATERIAL FACT THAT DEFENDANTS ARE NOT ENTITLED TO SUMMARY
JUDGMENT OR JUDGMENT AS A MATTER OF LAW*

MOTION OF THE PLAINTIFFS TO DISMISS, PURSUANT TO LR, D. MASS 7.1[A][2]
THE MOTION OF THE DEFENDANTS TO DISMISS PLAINTIFFS' COMPLAINT
PURSUANT TO FED. R. CIV. P. 12[B][6]

*PLAINTIFFS MOVE PURSUANT TO LR, D. MASS 7.1[A][2] FOR DISMISSAL OF
DEFENDANTS' MOTION BECAUSE COUNSEL AND DEFENDANTS HAVE NOT
CONFERRED AND ATTEMPTED IN GOOD FAITH TO RESOLVE OR NARROW
THE ISSUES RAISED IN THE COMPLAINT*

MOTION OF THE PLAINTIFFS TO DISMISS, PURSUANT TO LR, D. MASS 7.1[B][1]
THE MOTION OF THE DEFENDANTS TO DISMISS PLAINTIFFS' COMPLAINT
PURSUANT TO FED. R. CIV. P. 12[B][6]

*PLAINTIFFS MOVE PURSUANT TO LR, D. MASS 7.1[B][1] FOR DISMISSAL OF
DEFENDANTS' MOTION BECAUSE OTHER DOCUMENTS SETTING FORTH OR
EVIDENCING FACTS ON WHICH DEFENDANTS' MOTION IS BASED HAVE
FAILED TO BE FILED WITH THE MOTION*

MOTION OF THE PLAINTIFFS TO DISMISS, PURSUANT TO LR, D. MASS 15.1[A]
THE MOTION OF THE DEFENDANTS TO DISMISS PLAINTIFFS' COMPLAINT
PURSUANT TO FED. R. CIV. P. 12[B][6]

*PLAINTIFFS MOVE PURSUANT TO LR, D. MASS 15.1[A] FOR DISMISSAL OF
DEFENDANTS' MOTION BECAUSE COUNSEL AND DEFENDANTS HAVE
FAILED TO ADD PARTIES OF WHOM THEY HAVE ALREADY IDENTIFIED AND
BECOME AWARE*

MOTION OF THE PLAINTIFFS TO MOVE, PURSUANT TO LR, D. MASS 7.1[D]

*PLAINTIFFS MOVE PURSUANT TO LR, D. MASS 7.1[D] FOR REQUEST FOR
ORAL ARGUMENT BELIEVING THAT ORAL ARGUMENT WILL ASSIST THE
COURT*

THE GROUNDS FOR THESE MOTIONS ARE SET FORTH MORE FULLY IN THE
SUPPORTING MEMORANDUM.

RESPECTFULLY SUBMITTED,

PLAINTIFF #1

SIGNATURE

Bruce Wilson prose
DATED May 26, 2005

BRUCE WILSON
351 PLEASANT STREET
SUITE B . PMB 352
HAMPSHIRE COUNTY
NORTHAMPTON, MA 01060
413.262.8857 MOBILE

PLAINTIFF #2

SIGNATURE

Bruce Wilson, prose
DATED May 26, 2005

EMINENT ENERGY PROMOTIONS
BRUCE WILSON, PRESIDENT
351 PLEASANT STREET
SUITE B . PMB 352
HAMPSHIRE COUNTY
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